

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON TALCUM
POWDER PRODUCTS MARKETING,
SALES PRACTICES AND PRODUCTS
LIABILITY LITIGATION

MDL No. 3:16-md-02738

*This document relates to all cases
listed on Exhibit A*

**NOTICE OF MOTION TO
DISMISS PLAINTIFFS'
COMPLAINTS PURSUANT TO
RULE 41(b)**

TO: All Counsel of Record

COUNSEL:

PLEASE TAKE NOTICE that Defendants Johnson & Johnson and Johnson & Johnson Consumer Inc. ("Defendants"), will move before this Court on December 21, 2020, or as soon thereafter as counsel may be heard, pursuant to Fed. R. Civ. P. 41(b), for an Order dismissing Plaintiffs' complaints for failure to comply with this Court's October 13, 2020 Order.

PLEASE TAKE FURTHER NOTICE that, in support of this Motion to Dismiss, Defendants will rely upon the accompanying Letter Brief in Support.

PLEASE TAKE FURTHER NOTICE that a Proposed Order is attached.

PLEASE TAKE FURTHER NOTICE that oral argument is requested if the motion is opposed.

Respectfully submitted,

/s/ Susan M. Sharko

Susan M. Sharko
FAEGRE DRINKER BIDDLE
& REATH LLP
600 Campus Drive
Florham Park, NJ 07932-1047
Telephone: (973) 549-7000
Facsimile: (973) 360-9831
Email: susan.sharko@faegredrinker.com

*Attorneys for Defendants Johnson &
Johnson and Johnson & Johnson Consumer
Inc.*

Dated: November 25, 2020

EXHIBIT A

MDL Case No.	Plaintiff Name	Law Firm Name
3:17-cv-09127	Ellis, Paula	The Law Offices of Sean M. Cleary
3:18-cv-15782	Green, Catherine	Girardi & Keese
3:18-cv-08463	Herrmann, Linda	Simmons Hanly Conroy
3:19-cv-08359	Lagle, Sylvia	Heninger Garrison Davis
3:18-cv-12309	Richard, Donna	Marlin & Saltzman LLP
3:17-cv-06984	Smith, Sarah	Barrett Law Group